



Attorneys at Law
L'Abbate, Balkan, Colavita & Contini, L.L.P.
3 Huntington Quadrangle, Suite 102S, Melville, New York 11747
T. 516.294.8844 F. 516.294.8202
www.lbclaw.com

James D. Spithogiannis
Partner
jspithogiannis@lbclaw.com

Direct Dial: (516) 837-7464

March 5, 2025

VIA ECF

Hon. Nusrat J. Choudhury
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 1020
Central Islip, New York 11722

Re: *Deo, et al. v. Baron, et al.*
Case No. 2:24-cv-06903 (NJC) (JMW)

Dear Judge Choudhury:

L'Abbate, Balkan, Colavita & Contini, L.L.P., has been retained to represent Defendant Milman Labuda Law Group PLLC ("Milman") in the above-captioned matter. Enclosed is a Consent Substitution of Counsel Form signed by the undersigned and Milman (outgoing counsel/our client), as well as a Declaration in Support.

Our substitution into the case will not delay or impact any of the pending court-imposed deadlines. However, Milman consents to and joins in the portion of an application by certain Defendants in this action to hold in abeyance, or otherwise stay, the briefing schedule ordered by the Court concerning Defendants' anticipated motions to dismiss. Dkt. No. 69.

We respectfully request that the Court "so order" the substitution. Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read 'James D. Spithogiannis', written over a horizontal line.

James D. Spithogiannis

JDS/ELM/aml
Enc.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X	
<p>ANTHONY DEO individually and as shareholder/member of NORTSHORE MOTOR LEASING LLC and 189 SUNRISE HWY AUTO LLC; SARA DEO individually and as shareholder/member of NORTSHORE MOTOR LEASING LLC and NORTSHORE MOTOR LEASING, LLC and 189 SUNRISE HWY AUTO LLC,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">-against-</p> <p>RONALD BARON, JOSHUA AARONSON, JORY BARON, MARCELLO SCIARRINO, DANIEL O'SULLIVAN, BRIAN CHABRIER, WENDY KWUN, IRIS BARON, RAYMOND PHELAN, ASAD KHAN, ESTATE OF DAVID BARON, BARON NISSAN INC. d/b/a BARON NISSAN, ISLAND AUTO GROUP OF NEW YORK LLC a/k/a ISLAND AUTO GROUP OF NY LLC a/k/a ISLAND AUTO GROUP, ROBERT ANTHONY URRUTIA, BRUCE NOVICKY, MICHAEL MORGAN, PARMESHWAR BISSOON, SUPERB MOTORS INC. d/b/a TEAM AUTO DIRECT, RICHARDS, WITT & CHARLES, LLP, CITRIN COOPERMAN, NEXTGEAR CAPITAL INC., ALLY FINANCIAL INC., NISSAN MOTOR ACCEPTANCE COMPANY LLC d/b/a NMAC, JP MORGAN CHASE BANK N.A. a/k/a JP MORGAN CHASE & CO. a/k/a CHASE BANK N.A. d/b/a CHASE BANK, CYRULI, SHANKS & ZIZMOR, LLP, MILMAN LABUDA LAW GROUP, PLLC, JOHN DOE ATTORNEYS 1-20, JOHN DOE ACCOUNTANTS 1-20, JOHN DOES 1-20, JANE DOES 1-20, and JOHN DOE CORPORATIONS 1-20, and NEW YORK STATE DEPARTMENT OF MOTOR VEHICLES,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No.: 2:24-cv-06903 (NJC/JMW)</p> <p><u>CONSENT SUBSTITUTION OF COUNSEL</u></p>
-----X	


IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel and upon the annexed declaration of Jamie S. Felsen in accordance with Local Civil Rule 1.4 of the

Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, with the approval of Defendant Milman Labuda Law Group PLLC, and subject to the approval of the Court, the law firm of L'Abbate, Balkan, Colavita & Contini, L.L.P., is hereby substituted in place of the law firm of Milman Labuda Law Group PLLC as counsel of record for Milman Labuda Law Group PLLC as a Defendant in the above-captioned case.

PLEASE TAKE FURTHER NOTICE that all pleadings, notices of hearing and other filings in this matter should be served upon the undersigned incoming counsel.

L'ABBATE, BALKAN, COLAVITA
& CONTINI, L.L.P.

By:



James D. Spithogiannis
3 Huntington Quadrangle, Suite 102S
Melville, New York 11747
(516) 837-7385
Email: jspithogiannis@lbccclaw.com

Defendant Milman Labuda Law Group PLLC
Incoming Counsel

Dated: March 5, 2025

MILMAN LABUDA LAW GROUP PLLC

By:


Jamie S. Felsen
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042
516-328-8899
Email: jamiefelsen@mmmlaborlaw.com

Defendant Milman Labuda Law Group PLLC
Outgoing Counsel

Dated: 3/4/25

SO ORDERED:

/s/ James M. Wicks

3/6/25

James M. Wicks, U.S.D.J.

James M. Wicks, USMS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
ANTHONY DEO individually and as shareholder/member
of NORTSHORE MOTOR LEASING LLC and 189
SUNRISE HWY AUTO LLC; SARA DEO individually
and as shareholder/member of NORTSHORE MOTOR
LEASING LLC and NORTSHORE MOTOR LEASING,
LLC and 189 SUNRISE HWY AUTO LLC,

Plaintiffs,

-against-

RONALD BARON, JOSHUA AARONSON, JORY BARON,
MARCELLO SCIARRINO, DANIEL O'SULLIVAN,
BRIAN CHABRIER, WENDY KWUN, IRIS BARON,
RAYMOND PHELAN, ASAD KHAN, ESTATE OF
DAVID BARON, BARON NISSAN INC. d/b/a
BARON NISSAN, ISLAND AUTO GROUP OF NEW
YORK LLC a/k/a ISLAND AUTO GROUP OF NY LLC
a/k/a ISLAND AUTO GROUP, ROBERT ANTHONY
URRUTIA, BRUCE NOVICKY, MICHAEL MORGAN,
PARMESHWAR BISsoon, SUPERB MOTORS INC.
d/b/a TEAM AUTO DIRECT, RICHARDS, WITT &
CHARLES, LLP, CITRIN COOPERMAN, NEXTGEAR
CAPITAL INC., ALLY FINANCIAL INC.,
NISSAN MOTOR ACCEPTANCE COMPANY LLC
d/b/a NMAC, JP MORGAN CHASE BANK N.A.
a/k/a JP MORGAN CHASE & CO. a/k/a
CHASE BANK N.A. d/b/a CHASE BANK, CYRULI,
SHANKS & ZIZMOR, LLP, MILMAN LABUDA LAW
GROUP, PLLC, JOHN DOE ATTORNEYS 1-20,
JOHN DOE ACCOUNTANTS 1-20, JOHN DOES 1-20,
JANE DOES 1-20, and JOHN DOE CORPORATIONS 1-20,
and NEW YORK STATE DEPARTMENT OF MOTOR
VEHICLES,

Defendants.
-----X

Case No.: 2:24-cv-06903
(NJC/JMW)

**DECLARATION OF
JAMIE S. FELSEN
IN SUPPORT OF
MOTION FOR
SUBSTITUTION
OF COUNSEL**

Pursuant to 28 U.S.C. 1746(2), Jamie S. Felsen hereby declares as follows:

1. I am a partner in the law firm of Milman Labuda Law Group PLLC. I am an

attorney admitted to practice in the Courts of the State of New York, and I am admitted to practice before this Court.

2. I respectfully submit this declaration pursuant to Local Civil Rule 1.4 of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York in support of the Stipulation and Order of Substitution of Counsel, which seeks to substitute L'Abbate, Balkan, Colavita & Contini, L.L.P. as counsel of record, and in place of Milman Labuda Law Group PLLC, for Defendant Milman Labuda Law Group PLLC in the above-captioned matter.

3. The reason for this substitution is that Milman Labuda Law Group PLLC, as a Defendant, has requested that L'Abbate, Balkan, Colavita & Contini, L.L.P., represent it going forward in this action.

4. The substitution is on consent of outgoing counsel.

5. On September 4, 2024, Plaintiffs filed a Verified Complaint in the Supreme Court of the State of New York, Nassau County, against Milman Labuda Law Group PLLC and other Defendants in this action.

6. On September 30, 2024, this action was removed to this Court.

7. On January 31, 2025, Plaintiffs filed an Amended Complaint.

8. Defendant Milman Labuda Law Group PLLC currently has until April 1, 2025, to respond to the Amended Complaint pursuant to this Court's Order dated November 20, 2024. However, Defendant Milman Labuda Law Group PLLC consents to and joins in the portion of an application by certain Defendants in this action to hold in abeyance, or otherwise stay, the briefing schedule ordered by the Court concerning Defendants' anticipated motions to dismiss. Dkt. No. 69.

attorney admitted to practice in the Courts of the State of New York, and I am admitted to practice before this Court.

2. I respectfully submit this declaration pursuant to Local Civil Rule 1.4 of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York in support of the Stipulation and Order of Substitution of Counsel, which seeks to substitute L'Abbate, Balkan, Colavita & Contini, L.L.P. as counsel of record, and in place of Milman Labuda Law Group PLLC, for Defendant Milman Labuda Law Group PLLC in the above-captioned matter.

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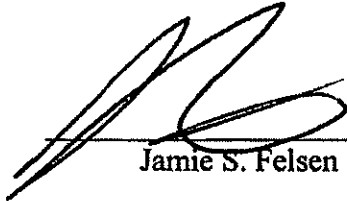
9. Incoming counsel will be prepared to respond to the Amended Complaint by April 1, 2025, or any future date set by the Court.

10. It is not anticipated the proposed substitution will cause any undue delay or in any way prejudice Plaintiffs in this action.

11. Milman Labuda Law Group PLLC, as counsel, will not be asserting any charging liens.

12. I declare under penalty of perjury that the foregoing is true and correct.

Dated: Melville, New York
March 4, 2025



Jamie S. Felsen